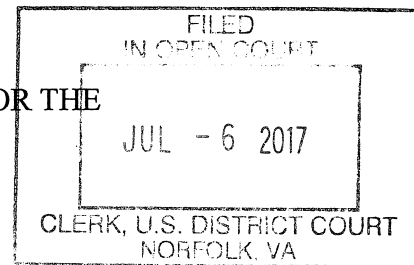


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

*Norfolk Division*



UNITED STATES OF AMERICA

v.

LIONEL NELSON WILLIAMS,  
a/k/a "Harun Ash-Shababi,"

Defendant.

Criminal No. 2:17cr1

18 U.S.C. § 2339B

Attempt to Provide Material Support or  
Resources to a Designated Foreign Terrorist  
Organization  
(Count 1)

18 U.S.C. § 981(a)(1)(G)

Asset Forfeiture

SUPERSEDING INDICTMENT

July 2017 Term—At Norfolk

THE GRAND JURY CHARGES THAT:

COUNT 1

ATTEMPT TO PROVIDE MATERIAL SUPPORT OR RESOURCES

(18 U.S.C. § 2339B)

1. On October 15, 2004, the United States Secretary of State designated al-Qa'ida in Iraq ("AQI"), then known as Jam'at al Tawhid wa'al-Jihad, as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act, and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224.

2. On May 15, 2014, the Secretary of State amended the designation of al-Qa'ida in Iraq as a FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant ("ISIL") as its primary name. The Secretary also added the following aliases to the listing: the Islamic State of Iraq and al-Sham ("ISIS"), the Islamic State

of Iraq and Syria (“ISIS”), ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. Although the group has never called itself “Al-Qaeda in Iraq (AQI),” this name frequently has been used to describe it through its history. In an audio recording publicly released on June 29, 2014, ISIS announced a formal change of its name to the Islamic State (“IS”). On September 21, 2015, the Secretary added the following aliases to the ISIS listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

3. Between on or about March 2016 and on or about December 22, 2016, in the City of Suffolk, in the Eastern District of Virginia, and elsewhere, defendant LIONEL NELSON WILLIAMS, a/k/a “Harun Ash-Shababi,” did knowingly and unlawfully attempt to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b)(1), including money, property, and services, to a foreign terrorist organization, to wit, the Islamic State of Iraq and Syria (“ISIS”), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization, knowing that ISIS had been designated as a foreign terrorist organization, and knowing that ISIS had engaged in, and was engaging in, terrorist activity and terrorism.

4. As part of his attempt to provide material support to ISIS, among other things, and understanding and believing that ISIS needed funds to support its violent activities, LIONEL NELSON WILLIAMS, a/k/a “Harun Ash-Shababi,” provided another person and other persons with a prepaid debit card and a monetary wire transmission, understanding and intending that those funds would be provided to ISIS, and used by ISIS, including to purchase weapons for fighting.

(All in violation of Title 18, United States Code, Section 2339B.)

FORFEITURE ALLEGATION

THE GRAND JURY FURTHER ALLEGES AND FINDS PROBABLE CAUSE THAT:

1. The defendant, if convicted of the violation alleged in this Superseding Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2:
  - a. All assets in which he has an interest, foreign or domestic;
  - b. All assets, foreign or domestic, affording a source of influence over any entity or organization engaged in planning or perpetrating any federal crime of terrorism, as set out in 18 U.S.C. § 2332b(g)(5);
  - c. All assets, foreign or domestic, acquired or maintained with the intent and for the purpose of supporting, planning, conducting, or concealing any federal crime of terrorism as set out in 18 U.S.C. § 2332b(g)(5); and
  - d. All assets, foreign or domestic, derived from, involved in, or used or intended to be used to commit any federal crime of terrorism, as set out in 18 U.S.C. § 2332b(g)(5).
2. If any property that is subject to forfeiture above, as a result of any act or omission of the defendant, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).
3. The property subject to forfeiture includes, but is not limited to:

- a. \$230 in U.S. currency seized from a 2001 Toyota Camry with VIN # 4T1BG22KX1U118805 on December 21, 2016;
- b. A sword in a black case, a knife in a blue case and a folding police knife seized from the defendant on December 21, 2016;
- c. An AK-47 rifle, an S&T Motiv/Lionheart Pistol, and a Ruger rifle seized from the defendant on December 21, 2016;
- d. A Marlin rifle seized from the defendant on December 21, 2016.

(In accordance with 18 U.S.C. § 981(a)(1)(G) by 28 U.S.C. § 2461(c).)

Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office

United States v. Lionel Nelson Williams, a/k/a "Harun Ash-Shababi"  
Criminal No. 2:17cr1

A TRUE BILL:

*Redacted*  
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FOREPERSON

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United States Attorney

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